

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
The Establishment of Policies) IB Docket 99-81
and Service Rules for the Mobile)
Satellite Service in the 2 GHz Band)

To: The Commission

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

COMMENTS OF APCO

The Association of Public-Safety Communications Officials-International, Inc. ("APCO") hereby submits the following comments in response to the Commission's Notice of Proposed Rulemaking ("NPRM") in the above-captioned proceeding regarding service rules for Mobile Satellite Services ("MSS"), FCC 99-50 (released March 25, 1999).

APCO is the nation's oldest and largest public safety communications organization. Most of its 13,000 individual members are state or local government employees involved in the management, design, and operation of police, fire, emergency medical, local government, highway maintenance, forestry conservation, disaster relief, and other public safety communications systems. APCO has two major concerns regarding this proceeding: (a) the impact of MSS feeder links on current and future public safety fixed microwave operations, and (b) the need to ensure that public safety officials will be able to locate and respond rapidly to emergencies reported by MSS users.

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MSS Feeder Links

Many public safety systems across the nation depend upon fixed microwave facilities to provide critical infrastructure to mobile radio and other emergency communications operations. These systems operate on many of the bands proposed for MSS feeder links. Thus, APCO supports the comments being filed today by the Fixed Wireless Communications Coalition (FWCC), of which APCO is a member. The FWCC describes several critical issues related to the allocation of spectrum for MSS feeder links, and the problems with sharing between those links and private operational fixed microwave facilities.

Enhanced 9-1-1

Many APCO members are also involved in the management and operation of Public Safety Answering Points (PSAPs), which answer 9-1-1 calls and dispatch emergency personnel. APCO has worked closely with other public safety organizations and wireless industry representatives to adopt and implement rules in CC Docket 94-102 that will ultimately allow for the location and call-back number of every wireless 9-1-1 call to be transmitted automatically to the appropriate PSAP.

The Commission seeks comments in paragraph 94 of the NPRM as to how its wireless 9-1-1 rules should apply to MSS. APCO believes that all commercial mobile radio services must have “enhanced 9-1-1” capability, including Automatic Location Information (“ALI”) and Automatic Number Information (“ANI”). This requirement should apply to satellite based services such as MSS, at least to the extent that subscribers of those systems have the same expectations as cellular and PCS customers when making a 9-1-1 call. They expect their call to be answered, and they expect to be

found. Indeed, to the extent that MSS is likely to be used in rural and wilderness areas (where other communications systems are often unavailable), ALI will be especially important, as callers from such remote areas often will not have an address or obvious landmark to which to refer when reporting an emergency.


Since MSS has yet to be implemented, now is the time to set the standards for 9-1-1 performance. The Commission must not repeat the unfortunate history of cellular, and to a lesser extent PCS, where substantial infrastructure and subscriber equipment was already in use when the E9-1-1 rules were adopted, thus requiring an extended implementation period. The technology to implement wireless enhanced 9-1-1 is developing quickly, and will certainly be in a mature state before MSS units are more widely available in the United States.

Therefore, for the reasons set forth above, APCO urges that the Commission adopt MSS service rules which protect and promote public safety.

Respectfully submitted,

ASSOCIATION OF PUBLIC-SAFETY
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